

Hearing Date: October 2, 2023 at 2:00 p.m.

VENABLE LLP

Jeffrey S. Sabin
1270 Avenue of the Americas, 24th Floor
New York, New York 10020
Telephone (212) 503-0896
Facsimile: (212) 307-5598
Email: JSSabin@venable.com

Andrew Currie (*admitted pro hac vice*)
600 Massachusetts Avenue, NW
Washington, DC 20001
Telephone: (202) 344-4586
Facsimile: (202) 344-8300
Email: AJCurrie@venable.com

Counsel to Ignat Tuganov

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X
In re:	:
CELSIUS NETWORK LLC, <i>et al.</i> , ¹	:
Debtors.	:
	:
	X

OPENING STATEMENT REQUEST OF IGNAT TUGANOV

Pursuant to this Court's *Order Establishing Case Management Procedures for the Confirmation Hearing*, dated September 15, 2023 [Dkt. No. 3478], Ignat Tuganov, a creditor of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") and as a

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 USA LLC (9450); GK8 Ltd. (1209); and GK8 UK Limited (0893). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

party to the Debtors' Plan Support Agreement, dated as of September 20, 2023 [Dkt. No. 3516], by and through his counsel, Venable LLP, requests leave for his counsel to make an opening statement at the October 2, 2023 Confirmation Hearing in support of the *Joint Chapter 11 Plan of Reorganization of Celsius Network LLC And Its Affiliates* [Dkt. No. 3319], as amended on September 27, 2023 [Dkt. No. 3577].² Mr. Tuganov estimates that his counsel's opening statement will last no longer than then (10) minutes.

Dated: New York, New York
September 27, 2023

VENABLE LLP

By: /s/ Jeffrey S. Sabin
Jeffrey S. Sabin
Carol Weiner Levy
Arie Peled
1270 Avenue of the Americas, 24th Floor
New York, New York 10020
Telephone: (212) 503-0896
Facsimile: (212) 307-5598
Email: JSSabin@venable.com
Email: CWeinerLevy@venable.com
Email: APeled@venable.com

- and -

Andrew J. Currie (*admitted pro hac vice*)
600 Massachusetts Avenue, NW
Washington, DC 20001
Telephone: (202) 344-4586
Facsimile: (202) 344-8300
Email: AJCurrie@venable.com

Counsel for Ignat Tuganov

² As an Amended Plan was filed on September 27, 2023 [Dkt. No. 3577] (the "Amended Plan") without notice to Mr. Tuganov, Mr. Tuganov will promptly review the Amended Plan and anticipates speaking in support of the Amended Plan at the Confirmation Hearing, but only after opening statements are made by the Debtors and the Official Unsecured Creditors' Committee and only to highlight material confirmation matters not previously addressed thereby.